

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311
	:	Honorable Marianne O. Battani

In Re: All Cases	:	
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THIS DOCUMENT RELATES TO:	:	
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All Actions	:	
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**STATEMENT CONCERNING EARNHARDT OBJECTION**

We have been advised that this dealership will agree to modify the attached objection if the parties agree that any information from its system, about its customers, sales, operations or profits will be treated as “CONFIDENTIAL” pursuant to the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information entered in Master File No. 12-MD-02311 and dated July 10, 2012 and the other protective orders in the action.

/s/ Shawn M. Raiter  
Shawn M. Raiter  
**LARSON · KING, LLP**  
2800 Wells Fargo Place  
30 East Seventh Street  
St. Paul, MN 55101  
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**Mary LaRue Walker**

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January 16, 2017

By email to [sraiter@larsonking.com](mailto:sraiter@larsonking.com)

Mr. Shawn Raiter  
Larson King, LLP  
30 East Seventh Street  
Suite 2800  
St. Paul, MN 55101

Re: **Earnhardt Avondale, Inc. d/b/a Earnhardt Honda re Objection**

Dear Mr. Raiter:

I am a lawyer and work as general counsel for the Earnhardt dealerships, including Earnhardt Avondale, Inc. d/b/a Earnhardt Honda.

I am writing on behalf of my client to object to the production of information regarding the vehicles it sold, the price of those vehicles, and the gross or net profit it garnered from those sales in connection with the civil class action against suppliers of auto parts found to have engaged in bid rigging and price fixing. The objection is based, at least in part, to the inability of the records of Honda North America to accurately determine my client's net or gross profit on any given transaction.

Please feel free to contact me with any questions.

Very truly yours,



Mary LaRue Walker

MLW/mlc  
C, by U.S.P.S.: Shawn Raiter